

## Response to the CTA's regulatory modernization initiative

Written by Donna J. Jodhan

On behalf of Barrier Free Canada - Canada sans Barrières

### Introduction

I am submitting my comments as a vision impaired person who is a regular air traveler and as someone whose organization is actively pursuing the call for the passage of a Canadians with disabilities Act.

On a personal level, it is my sincere hope that any future regulations that fall under the jurisdiction of the Canadian Transportation Agency would be ones that protect, recognize, and legitimize the rights of Canadian travelers with disabilities and on behalf of my organization I hope that the Canadian Transportation Agency would support the passage of said legislation.

I believe that the Federal Government's mandate to enact a Canadians with disabilities Act is an important step in the right direction but in addition, more work needs to be carried out by the Canadian Transportation Agency.

The following is a list of suggestions and comments.

### Binding regulations

Systemic changes can only be achieved through the use of stricter regulations that would be binding. Codes of practice can only be effective if they are stricter and laid out more clearly so that transportation companies can follow them more easily.

Regulations and codes of practice should be mandated and consequences for not following codes and regulations should be clearly spelled out and implemented and here is where a Canadians with disabilities Act can help to make it happen. In addition, the Canadian Transportation Agency could be given more power to ensure that these regulations and codes of practice are adhered to and penalties for non compliance are enforced.

#### End to end accessibility services

Accessibility services would commence as soon as a passenger starts their preparations for a trip; via air, rail, ferry, bus, etc. Companies should be mandated to make their websites and phone support fully and equally accessible.

In the case of air travel, accessible services should begin at curb side and continue on through check in, up to the doors of the aircraft and continue on board the aircraft. The same should be mandated upon arrival; from aircraft right through to exiting the terminal.

A similar offering should be mandated for those traveling via rail, ferry, and bus; from arrival to the end of the voyage.

The use of technology for better communication

Airport terminals should be equipped with way finder technology so as to enable passengers who are blind and vision impaired to be able to navigate more independently. Example, to be able to find restaurants, washrooms, shopping areas, and more without having to seek assistance.

Kiosks at airports should be made accessible to blind and vision impaired travelers. Screens at airport terminals should be outfitted with close captioning, and airlines should be mandated to provide accessible apps that can assist passengers with disabilities to be aware of such things as flight delays and gate changes.

Other suggestions:

Suitable relief areas for service animals, public announcement systems that are easy to hear.

Appropriate training for personnel

All personnel employed by airports, airlines, railways, and bus and ferry companies should receive regular training and all companies should be mandated to do this on a regular basis.

Suggestions: How to communicate such things as gate changes and flight delays to passengers with disabilities, and how to provide related assistance when requested.

They should be mandated to provide proof that the appropriate training has been carried out and annually would be a good time frame. These reports should be lodged with the Canadian Transportation Agency and penalties should be handed down if companies fail to comply.

Appropriate manuals should be developed to cover employee training for the various types of disabilities and input from travelers with disabilities should be mandated to be a part of this manual.

Training sessions should be a joint venture between industry and persons with disabilities. Regular presentations should be mandated to take place; annually would be a good time frame and proof of these face to face sessions should also be a part of the training mandate.

accessibility-related services

These types of services would include:

Curb side assistance, escort assistance, check in assistance,  
porter assistance.

### Improving service standards

Industry, along with the Canadian Transportation Agency and stakeholders from the disabilities persons community should be given the task to work together to set up a suite of standards so that accessibility services can be improved.

This committee should be mandated to meet face to face at least every two years, six monthly tele conferences could be held, recommendations made, and taken to the appropriate lawmakers within a reasonable period of time. Or the Canadian Transportation Agency could be given the task to monitor and ensure that they are implemented.

### Website accessibility

Every company that resides in the travel industry along with the Canadian Transportation Agency should be mandated to make their websites fully accessible and this would meaning adhering to W3C standards. All online complaints processes should also be made fully accessible and should be tested by persons with disabilities before implementation.

### Training and communication

All industry stakeholders should be mandated to provide regular bulletins to stakeholder organizations for and of persons with disabilities with regard to their training efforts,

changes to their services with emphasis on accessibility services. If there are any new website announcements then these too should be communicated.

Partnerships with stakeholder organizations should be developed and these announcements could be filtered through these partners.

Greater involvement by persons with disabilities with regard to regulatory changes pertaining to disability issues

The Canadian Transportation Agency should also be mandated to include persons with disabilities as part of their members panel and these stakeholders should be given the opportunity to give input in to regulations and codes of practice.

Other suggestions for the Canadian Transportation Agency

A revamp of their complaints system so that it becomes more accessible, user friendly, and easy to understand.

More support for those lodging complaints; to provide explanations and guidance.

Some sort of legal resource for complainants if they are being taken to court by respondents.

The Canadian Transportation Agency to be given the power to initiate investigations into accessibility issues, to issue interim orders and to order compensation for harm

A Canadians with disabilities Act could help to make this possible. Additionally, it would be a way to strengthen the powers of the Agency.

A need for consistent and systemic enforcement

Consistent penalties to be implement and enforced whenever legal regulations and codes of practice are not adhered to and penalties to be made meaningful Example; not just a steep appropriate monetary penalty but also some sort of public notification for those who break the regulations and codes of practice.

A monitoring system

An appropriate monitoring system to be set up and managed by the Canadian Transportation Agency. This system would monitor such things as training, number of complaints that are lodged with companies (complaints settled and those headed for other action)

A regular monitoring of companies websites and phone services for quality assurance.

A regular reporting system

This is where companies would be mandated to provide annual reports on the following:

Training, accessibility services, accessible websites, and complaints.